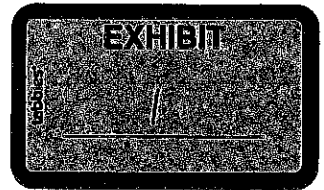


STATE OF ILLINOIS  
ILLINOIS COMMERCE COMMISSION



AMEREN TRANSMISSION COMPANY  
OF ILLINOIS

Petition for Certificate of Public Convenience  
and Necessity, pursuant to Section 8-406 of  
the Illinois Public Utilities Act

Docket No. 12-0598

**AFFIDAVIT OF MARY D. BURNS**

**(Submitted on Behalf of the Coalition of Property Owners  
and Interested Parties in Piatt, Douglas, and Moultrie Counties)**

Now comes MARY D. BURNS, and after first being duly sworn upon her oath deposes and  
says:

**Q.** Please state your name and address.

**A.** My name is Mary D. Burns. 10 Oakwood Drive, Springfield, Illinois 62711.

**Q.** Do you own property in the vicinity of the MCPO proposed alternate route from Mt. Zion  
to Kansas?

**A.** Yes. I own farmland and a homestead site in Unity Township, Piatt County, located in the  
Northwest Quarter of Section 32 and the Southwest Quarter of Section 29.

**Q.** Describe the homestead at that location.

**A.** The homestead is located in the Northwest corner of the Northwest Quarter of Section 32 (39  
degrees 48 minutes 22 seconds North, 38 degrees 33 minutes 21 seconds West). The home was built  
by my grandfather in 1923 and is architecturally significant. Exhibit A attached hereto is a  
photograph of this homestead.

**Q.** How will the MCPO proposed alternate route from Mt. Zion to Kansas affect your homestead and farmland in Unity Township, Piatt County?

**A.** The proposed MCPO alternate route (per the map attached to MCPO's January 2 "errata" filing) cuts through the middle of the Southwest Quarter of Section 29 (Township 16 North, Range 6 East), and therefore would be directly upon the farmland owned by me and adjacent to that owned by my brother, James Daugherty. The proposed MCPO "refined" alternate route (per the map attached to MCPO's March 20 response to our data requests) moves the route 1/8 mile south on our farm from that submitted on January 2. Our farmland consists of prime soil, some of the richest in the world. Farmland of this quality is very valuable and has increased significantly in value over the past few years. My brother and I are third and fourth-generation owners of our farmland. A portion of this farm has been in our family for over 100 years. Transmission poles planted in my fields would forever destroy the land where they are located, interfering with all aspects of crop production, impeding and decreasing efficiency, visually scarring the property, and resulting in a significant reduction in farmland value, as well as an environmental blight on this area of the rural landscape. The centerline depicted on the MCPO map (March 20 response to data request) cuts across my farmland in Section 29 at one-eighth mile north of the southern section line, with no regard for section lines, property lines, or farming practices as these relate to individual parcels. The MCPO maps show the same to be true for many of my neighbors' farms along the route across southern Piatt County and for farms located in Douglas County. The construction of a transmission line across our farmland would result in soil compaction throughout the 150-foot easement, which will have an extremely negative effect on crop production. Ameren ground access across the easement area for transmission line repair caused by storms and other conditions will further damage this highly

productive ground. The southernmost portions of Piatt County offer some of the region's best farms.

**Q.** What factors to your knowledge make the MCPO proposed alternate route from Mt. Zion to Kansas an inferior route to the primary and alternate routes proposed by Ameren from Mt. Zion to Kansas?

**A.** The most obvious factor is that the only apparent purpose for MCPO's proposed alternate route is to move it out of Moultrie County to the north into Piatt County. To do this, and to move the proposed transmission line to the north of U.S. Route 36, requires the line to be run far north of what would be a relatively straight southeasterly route from Mt. Zion to Kansas. This would necessarily involve more expense, more disruption of farmland and other property types, and more negative impacts simply as a result of the longer transmission line required to make such an extended detour around Moultrie County. The ATXI developed study routes for the Mt. Zion to Kansas segment show no routes above U.S. Route 36 and no routes in either Piatt or Douglas Counties. The Kansas substation is approximately 49 miles east and 14 miles south of the Mt. Zion substation, and a straight line between the two runs directly through Moultrie County.

**Q.** Is there anything in particular about the MCPO routing across farmland that makes it less desirable than ATXI's primary and alternate routes?

**A.** Yes. The MCPO proposed alternate route uses more "short spans" of .25 mile or less. The ATXI primary route map indicates three short spans, while the MCPO proposed "refined" alternate route from Mt. Zion to Kansas (MCPO's March 20 response to data request) indicates eight. The short spans result in two right angles on the same parcel of land or in close proximity to a single parcel of land, which is problematic for agricultural practices, including crop dusting. Also, because short spans require additional poles, the MCPO proposed alternate route will result in increased cost.

Another negative impact of the MCPO route is that it bisects 47 separate sections of land (MCPO's map submitted with its "errata" filing on January 2), whereas the ATXI primary route bisects only 33, based on the map ATXI has submitted.

**Q.** Are there other negative impacts of the MCPO proposed alternate route that are unique to your particular farmland property?

**A.** Yes. The north 160-acre parcel of our farmland is bordered on the west by a short telephone transmission line and on the south by a somewhat taller electric transmission line. Adding the ATXI transmission line along the route proposed by MCPO over this 160-acre tract would make it almost impossible for crop dusting planes to access this tract because they would have to fly over and under three different transmission lines running in two different directions, as well as avoid the 35-foot tall structures on the homestead site. One particular reason for this is that MCPO's proposed "refined" line (submitted with its March 20 response to our data request) would be located parallel and less than 660' from the existing electric transmission line, and crop dusting planes would have to fly under one and over the other.

**Q.** Why do you believe the north side of the U.S. Route 36 corridor on the Piatt-Moultrie County border is a poor location for the Mt. Zion to Kansas route?

**A.** Not only is U.S. Route 36 far north of the straight line southeast diagonal from Mt. Zion to Kansas, but the U.S. Route 36 corridor has several towns which are all located on the north side of U.S. Route 36 in Piatt County, including La Place, Hammond, Pierson Station, and Atwood. By contrast, there are no towns located on the south side of the U.S. Route 36 corridor in Moultrie County.

**Q.** Has the Piatt County Board taken a position on the MCPO proposed alternate route?

**A.** Yes. On February 22, 2013, the Piatt County Board passed a resolution stating its opposition to the MCPO proposed route through Piatt County, Illinois. A copy of this Board resolution is attached hereto as Exhibit B.

**Q.** Do you have any other objections to the MCPO proposed alternate route from Mt. Zion to Kansas?

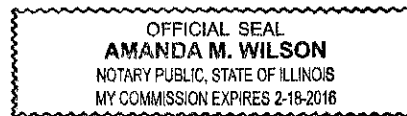
**A.** Yes. MCPO did not file its current proposed alternate route until after the deadline for filing alternate routes had passed. The deadline for filing alternate routes was December 31. On that date, MCPO filed a proposed alternate route from Mt. Zion to Kansas. That route was located one-half mile south of U.S. Route 36 in Moultrie County at its closest point to our farm. On January 2, MCPO filed a one sentence "errata" which states that an MCPO reference to potential Route 2 should be changed to read potential Route 1 in its December 31 filing. However, the route maps attached to this errata filing are different than the route maps attached to MCPO's December 31 proposed alternate route filing. Instead of being located one-half mile south of U.S. Route 36 in Moultrie County at its point closest to my farm, the map attached to the January 2 filing showed the route one and one-quarter miles north of U.S. Route 36 in Piatt County, bisecting the north 160 acres of our farm. MCPO tried to change the route and, in the location nearest my farm, move it from Moultrie County one and three-quarters miles north into Piatt County, although the deadline for filing alternate routes had passed.

Further affiant saith not.

Mary D. Burns  
MARY D. BURNS

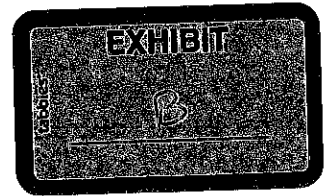
SUBSCRIBED AND SWORN to before me this 28<sup>th</sup> day of March, 2013.

Amanda M. Wilson  
Notary Public



216843





## PIATT COUNTY BOARD AMEREN RESOLUTION

WHEREAS, On November 7, 2012, Ameren Transmission Company of Illinois (ATXI) filed a proposed Primary Route and an Alternate Route for the Illinois Rivers Project with the Illinois Commerce Commission (ICC); and

WHEREAS, Both the Primary Route and the Alternate Route go through Moultrie County, and neither the Primary Route nor the Alternate Route go through Piatt County; and

WHEREAS, Moultrie County Property Owners (MCPO), comprised of six (6) property owners, filed as Intervenors with the ICC opposing both the Primary and Alternate ATXI routes through Moultrie County and proposing a new route through Piatt County; and

WHEREAS, On December 13, 2012, the Moultrie County Board adopted a resolution opposing routing the ATXI transmission through Moultrie County; and

WHEREAS, On January 2, 2013, a member of MCPO posted the Moultrie County Board Resolution on the ICC website as public comment; and

WHEREAS, ATXI has stated that it has conducted a comprehensive route siting study and analysis to support its Primary Route and Alternate Route; and

WHEREAS, It appears that ATXI has considered Piatt County, Illinois, in its possible route and has eliminated Piatt County from the Primary Route and the Alternate Route; and

WHEREAS, Piatt County consists of prime farmland with some of the richest soils in the world; and

WHEREAS, Piatt County farms consistently rank in the top crop producing counties in the State of Illinois, and

WHEREAS, Farmland in Piatt County is largely undisturbed by industrial development; and

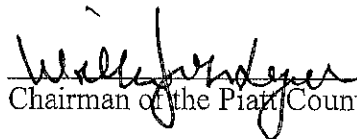
WHEREAS, The location of a transmission line through Piatt County would result in a drastic reduction in the value of rural properties and farmland; and

WHEREAS, The location of a transmission line through Piatt County would have little economic benefit to Piatt County and its citizens; and


WHEREAS, the location of transmission line through Piatt County would forever be a blight on the landscape of Piatt County, Illinois.



BE IT HEREBY RESOLVED on this 22<sup>nd</sup> day of February, 2013, that the County Board of Piatt County, Illinois is opposed to the Moultrie County Property Owners proposed route or any other proposed route for the ATXI transmission line through Piatt County, Illinois.

  
Chairman of the Piatt County Board

ATTEST:

  
Piatt County Clerk and Recorder